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12 *Attorneys for Plaintiff,*
13 *Jennafer Aycock*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 **JENNAFER AYCOCK,**

17 **Plaintiff,**

18 **vs.**

19 **CITIBANK, N.A.; EXPERIAN**
20 **INFORMATION SOLUTIONS, INC.;**
21 **TRANS UNION, LLC,**

22 **Defendants.**

Case No.: 2:23-cv-00293-APG-VCF

**REQUEST TO EXTEND TIME FOR
DEFENDANT TRANS UNION, LLC
TO ANSWER THE INITIAL
COMPLAINT**

(Second Request)

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1 Plaintiff Jennafer Aycock (“Plaintiff”) hereby files this second unopposed
2 Request for Extension of Time for Defendant Trans Union, LLC (“TransUnion”) to
3 Answer the initial complaint, and in support states as follows:


- 4 1. On February 24, 2023, Plaintiff filed the present lawsuit (Dkt. No. 1).
- 5 2. TransUnion was served with the Complaint on March 9, 2023.
- 6 3. TransUnion’s responsive pleading is due on April 30, 2023.
- 7 4. Plaintiff and TransUnion are actively engaged in case-resolution
8 negotiations.
- 9 5. Plaintiff does not oppose an extension of TransUnion’s time to Answer
10 the Complaint so that the parties may devote their energies to resolving this matter.
11 This request is filed consistent with an agreement from Trans Union requesting the
12 Court for an extension of time to file its responsive pleading for 30 days, to May 30,
13 2023.
- 14 6. This request for an extension of time is not for delay.
- 15 7. This is TransUnion’s first extension of time and the requested
16 extension does not prejudice the parties.
- 17 8. For the foregoing reasons, Plaintiff requests that the Court issue an
18 order extending the date on which TransUnion must answer or otherwise respond to
19 Plaintiff’s Complaint to May 30, 2023.

20
21 Dated: April 28, 2023

Respectfully submitted,

22
23 **KAZEROUNI LAW GROUP, APC**

24
25 IT IS SO ORDERED.

26 

27 Cam Ferenbach
28 United States Magistrate Judge

By: /s/ Gustavo Ponce

GUSTAVO PONCE, ESQ.

MONA AMINI, ESQ.

6787 W. TROPICANA AVE., STE 250

LAS VEGAS, NV 89103

Attorneys for Plaintiff

DATED _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on April 28, 2023, the foregoing Notice was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce

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